

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

AARON GOINES, et al.,

Plaintiffs/Counter-Defendants,

v.

1:19-CV-489

TITLEMAX OF VIRGINIA, INC., et al,

Defendants/Counter-Plaintiffs.

**BRIEF IN SUPPORT OF TROUTMAN PEPPER HAMILTON SANDERS, LLP'S
MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANTS**

William J. Farley III and Troutman Pepper Hamilton Sanders, LLP (collectively, "Troutman Pepper") hereby submit this brief in support of their Motion to Withdraw as counsel for TitleMax of Virginia, Inc., TitleMax of South Carolina, Inc., and TMX Finance of Virginia, Inc. (collectively, "TitleMax").

BACKGROUND

On December 15, 2022, Thomas R. Woodrow of Holland & Knight, LLP and Anthony Durone of Berkowitz Oliver, LLP appeared in this matter as counsel for TitleMax. (ECF Nos. 241-242.) On December 16, 2022, Stacey Gilman of Berkowitz Oliver, LLP appeared in this matter as counsel for TitleMax. (ECF No. 243.) On December 19, 2022, Justin Rodriguez and Owen Barcala of Atkinson Baker & Rodriguez, P.C. appeared in this matter as counsel for TitleMax. (ECF Nos. 244-245.)

QUESTION PRESENTED

May Troutman Pepper withdraw from this matter as counsel for TitleMax to accomplish a substitution of counsel?

ARGUMENT

The Court should permit Troutman Pepper to withdraw because substitute counsel has appeared for TitleMax. Further, TitleMax is aware of Troutman Pepper's Motion to Withdraw and wishes to substitute counsel, which will be accomplished through the grant of this Motion.

CONCLUSION

Troutman Pepper respectfully requests that the Court grant their Motion to Withdraw as counsel for TitleMax and permit William J. Farley III and Troutman Pepper Hamilton Sanders LLP to withdraw from this matter. A proposed Order has been submitted with the Motion and a copy of the same will be provided to chambers.

This the 22nd day of December, 2022.

s/ William J. Farley III

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing BRIEF IN SUPPORT with the Clerk of Court using the CM/ECF system. I further certify under Local Rule 83.1(e)(3) that a copy of the foregoing BRIEF IN SUPPORT has been served on TitleMax at the following addresses:

TitleMax of Virginia, Inc.
100 Shockoe Slip, Floor 2
Richmond, VA 23219

TMX Finance of Virginia, Inc.
100 Shockoe Slip, Floor 2
Richmond, VA 23219

TitleMax of South Carolina, Inc.
508 Meeting Street
West Columbia, SC 29169

This the 22nd day of December, 2022.

s/ William J. Farley III
William J. Farley III (State Bar No. 44373)

CERTIFICATE OF WORD COUNT

I certify under Local Rule 7.3(d)(1) that the body of this brief, headings, and footnotes together contain 6,250 words or fewer, as reported by the word count feature in Microsoft Word.

This the 22nd day of December, 2022.

s/ William J. Farley III

William J. Farley III (State Bar No. 44373)